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UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

CALIFORNIA INSTITUTE OF
TECHNOLOGY,

Plaintiff,

v.

SAMSUNG ELECTRONICS CO., LTD. and
SAMSUNG ELECTRONICS AMERICA,
INC.

Defendants.

Case No. 5:22-MC-80318-VKD

E.D. Tex. Case No. 2:21-CV-0446-JRG

**RE-NOTICE OF PLAINTIFF
CALIFORNIA INSTITUTE OF
TECHNOLOGY'S MOTION TO
COMPEL SUBPOENA COMPLIANCE
BY BROADCOM CORP. AND
BROADCOM INC.**

PLEASE TAKE NOTICE that on Tuesday, December 27, 2022 at 10:00 AM, or as soon thereafter as the matter may be heard, Plaintiff California Institute of Technology ("Caltech") will and hereby does move for entry of an order under Rules 37 and 45 of the Federal Rules of Civil Procedure compelling Broadcom Corp. and Broadcom Inc. to produce documents and information in accordance with subpoenas served on both entities in a case pending in the United States District Court for the Eastern District of Texas, *California Institute of Technology v. Samsung Electronics Co., Ltd. et al.*, No. No. 2:21-CV-0446-JRG. Caltech is re-noticing this motion in accordance with this Court's November 23, 2022 Order reassigning this matter and Magistrate Judge DeMarchi's Standing Order for Civil Cases.

The grounds for this Motion are set forth in the Memorandum of Points and Authorities and the accompanying exhibits and Declaration of Ravi Bhalla, filed on November 21, 2022. *See* Dkt. 1.

1 Dated: November 28, 2022

2 Respectfully submitted,

3 By: /s/ Kalpana Srinivasan
4 Kalpana Srinivasan
5 California State Bar No. 237460
6 ksrinivasan@susmangodfrey.com
7 **SUSMAN GODFREY LLP**
8 1900 Avenue of the Stars, Suite 1400
9 Los Angeles, CA 90067
10 Telephone: (310) 789-3100
11 Facsimile: (310) 789-3150

12 Ravi Bhalla
13 *Pro hac vice pending*
14 New York State Bar No. 5478223
15 rbhalla@susmangodfrey.com
16 **SUSMAN GODFREY LLP**
17 1301 Avenue of the Americas, 32nd Fl.
18 New York, NY 10019
19 Telephone: (212) 336-8330
20 Facsimile: (212) 336-8340

21 *Attorneys for Plaintiff California Institute of*
22 *Technology*

23 **CERTIFICATE OF SERVICE**

24 I hereby certify that a true and correct copy of the foregoing has been served via e-mail on
25 the following individual, counsel for Broadcom, who represented to me via e-mail that he is
26 authorized to accept electronic service on behalf of Broadcom Corp. and Broadcom Inc.

27 Taylor Gooch
WilmerHale
One Front Street, Suite 3500
San Francisco, CA 94111 USA
Taylor.Gooch@wilmerhale.com

28 /s/ Ravi Bhalla

29 Ravi Bhalla